



TECHNET
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April 13, 2017

The Honorable Ajit Pai
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Business Data Services in an Internet Protocol Environment, WC
Docket No. 16-143**

Dear Chairman Pai:

TechNet is pleased to support the Commission's recent draft Order designed to "[spur entry, innovation and competition](#)" in the vitally important Business Data Services (BDS) market. In our view, the Order's focus on modernizing BDS regulations to better reflect emerging technologies, existing marketplace competition, and changing business demands is the correct course of action.

As the Commission knows, the BDS marketplace is experiencing significant technological and market change. During the past decade, a variety of competitive providers have invested in and deployed BDS services, such as Ethernet, to compete with incumbent services, and competitors are capturing a growing share of the market.

America's businesses now demand fast and accessible broadband. This will become even more important as the "Internet of Things" creates new applications and business opportunities. Moreover, deployment of next-generation wireless broadband, including 5G, will also require access to robust BDS services to enable that technology.

As we have stated previously to the Commission (see Letter to Chairman Wheeler, August 22, 2016), it is crucial that federal BDS rules focus on encouraging deployment of better forms of access. This is critically important for all business locations, especially those in office parks and office buildings, anchor institutions, hospitals, and libraries. TechNet is pleased to see the current proposed Order's recommendation to end tariffing and create a new competitive market test as a means to promote greater investment in broadband facilities. The proposal to grant additional flexibility for schools, libraries, and rural healthcare clinics is also a reasonable step forward.

Above all, TechNet urges the Commission to keep its regulatory focus on incentivizing investment in the country's broadband infrastructure. Increased investment and competition will produce better and more tailored broadband options that meet business' demands.

Thank you for the opportunity to express TechNet's views on BDS competition and incentives for broadband deployment.

Sincerely,



Linda Moore
President & CEO